

## United States District Court

AUG 28 2014

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Case Number:

M-14-1678-M

Juan Manuel Lerma-Gonzalez  
A097 738 835PRINCIPAL  
YOB: 1976

Mexico

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 26, 2014 in Brooks County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Alejandro Martinez-Aguilera, citizen and national of the United Mexican States and Jorge Luis Hernandez-Ramirez, citizen and national of Honduras and four (4) other undocumented aliens for a total of six (6) who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport by foot said aliens in furtherance of such violation of law within the United States, that is, from a location near Encino, Texas to the point of arrest near Encino, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 26, 2014, at approximately 9:00 pm, Texas DPS Troopers observed a group of subjects run across highway 281 and relayed the information to SBPA R. Tovar. Agent Tovar responded and was able to apprehend seven (7) subjects. All subjects freely admitted to being illegally present in the United States. The group was transported to the Weslaco Border Patrol Station for processing.

At the Weslaco Border Patrol Station, biometric data was taken from every member of the group and through these checks and further investigation, LERMA-Gonzalez, Juan Manuel was identified as the group's foot guide.

## SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

  
Signature of Complainant

Derek Conrow Senior Patrol Agent  
Printed Name of Complainant

Sworn to before me and subscribed in my presence,

August 28, 2014

Date

at McAllen, Texas  
City and State

Peter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1678-M**

**RE: Juan Manuel Lerma-Gonzalez**

**A097 738 835**

**PRINCIPAL STATEMENT:**

Juan Manuel LERMA-Gonzalez was read his rights. LERMA did not wish to make a statement without the presence of an attorney.

**MATERIAL WITNESS STATEMENTS:**

All the material witness statements were read their rights. All agreed to provide a statement without the presence of an attorney.

Alejandro Martinez-Aguilera claimed to be a citizen of Mexico and admitted to illegally entering into the U.S. He also stated he paid \$1,500 (USD) and was going to pay an additional \$2,000 (USD) upon arriving in Houston, Texas. After illegally crossing the Rio Grande River, Martinez was taken to several stash houses before ultimately being transported north in an effort to walk and circumvent the checkpoint. When he and the group were dropped off, the foot guide known as Juan, instructed them to follow him and not get lost. Border Patrol was in the area and was able to apprehend several subjects from the group but he and others managed to get away. The foot guide remained with the group and again instructed them to walk in a straight line and to hide if Border Patrol was near. He further stated they walked with the foot guide for a day and a half before being arrested. While walking, the foot guide stated there would be a minivan waiting for them at the pick-up location. Martinez identified the foot guide as Juan Manuel Lerma-Gonzalez and stated he was apprehended in the group also.

Jorge Luis Hernandez-Ramirez claimed to be a citizen of Honduras and admitted to illegally entering into the U.S. He also stated his father made the smuggling arrangements and was going to pay \$3,800 to be smuggled to Houston, Texas. Hernandez stated after crossing into the U.S., he was taken to a stash house where he met the foot guide known as Juan. They were then transported north to walk around the checkpoint. While doing so, Border Patrol arrived in the area and managed to apprehend several subjects in the group. The foot guide and several others were not apprehended and continued to walk for a day and a half without food or water. He added at one point, several subjects got lost but were found by the foot guide and joined the rest of the group. Hernandez identified Juan Manuel Lerma-Gonzalez as the foot guide and person instructing them to remain in a straight line and run if encountered by Border Patrol